

KAISAM

215-45-4345

IN THE UNITED STATES DISTRICT COURT FOR THE MARYLAND

JOSEPH KAISAM

Petitioner

VS.

UNITED STATES

IMMIGRATION CUSTOM ENFORCEMENT

(ICE)

Respondent

CASE

JKB/16.1065

FILED

LOGGED

ENTERED

RECEIVED

APR - 7 2016

CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

DEPUTY

PETITIONER MOTION TO REMOVE DETAINER OR WRIT OF
MANDAMUS TO THE ICE DIRECTORS TO CEASE/ILLEGAL/
UNCONSTITUTIONAL PRACTICE CARRIED OUT BY ICE OFFICIAL
AND TO THE COURT OF UNITED STATES DISTRICT COURT
DUE TO PETITIONER BEING HELD IN VIOLATION OF THE LAWS
OF THE U.S. AND MARYLAND CONSTITUTION ALSO FRAUD.
Comes Now, the petitioner (JOSEPH KAISAM 215-45-4345),
Prase in the aboveslyked action and after duly being sworn depose

By JOSEPH KAISAM 445897

P.O. Box 534

JESSUP, MD 20794

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215-45-4345

Petitioner is a citizen of Sierra Leone and

U.S. Permanent Resident. He was order removed on

December, 2014. The U.S. ICE still can not removed

Petitioner to country of birth. The Petitioner was

convicted September, 2009 and was released on August

2011. He was placed in the custody of ICE at that

time. Petitioner later filed a relief for Post conviction

and he have get that Post conviction on April 29, 2015.

ICE sent Petitioner to a writ to P.G. County, Maryland

for the Post conviction. On April 29, 2015 left for that writ

but the ICE put hold detain on Petitioner. ICE can

not get a travel document for the Petitioner. Petitioner

is still wanting for his removed for this country. An ICE

agent denies told that he can not get the travel

document for my country. He told me they are going

to hold me as long as the can. I am asking this

court to order them to release me. Petitioner asserts

he been DISCRIMINATED AGAINST AND DEPRIVED OF

Equal Protection in the ICE COURT. Please see the 14th

Amendment of the United States Constitution. See City of

Cleburne v. Cleburne Living Center 473 U.S. 432, 105 S.Ct. 3249,

821 F.2d 313, (1985) which held: "A Equal Protection Violation

occurs anytime Government treats someone DIFFERENTLY THAN

ANOTHER WHO IS SIMILARLY SITUATED"

PETITIONER SS# 215-45-4345.

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215-45-4345

PETITIONER asserts he has been DEPRIVED OF DUE

Process

PETITIONER Motion To Remove DETAINER HOLDER

Comes Now, JOSEPH KAISM, Proceeding Prose hereby Move His Honorable Court, to Remove Detainer holder because the UNITED STATE IMMIGRATION CUSTOM ENFORCEMENT (ICE) failed to comply with its obligation to produce such information in a timely fashion.

1. On December, 2014 Petitioner was Order

detained. Petitioner filed a Motion for release with the clerk of court and upon the office of the Attorney General.

2. Counsel for the government has not provided initial release to the Petitioner. Prose wishes to attempt to resolve all such order, detached issues informally before filing any Petitioner motions, and to only file such motions should these informal efforts be unavailing.

3. Accordingly the Petitioner request that the court compel the government to comply with it detainer holder remove obligations

CONCLUSION

Wherefore, Petitioner (JOSEPH KAISAM) respectfully requests this Honorable Court (AS RELIEF)

1. FAILURE TO GET TRAVEL DOCUMENT FROM PETITIONER COUNTRY GOVERNMENT
2. HOLDING AND DETAINER OR PLACING A HOLDING DETAINER ON PETITIONER STOPPING FROM GETTING RELEASE.
3. LOSS/LACK OF JURISDICTION
4. ICE IS ABUSING POWER
5. ORDER ICE TO REMOVE DETAINER HOLDER

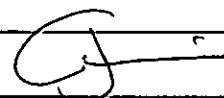
Petitioner respectfully request Liberal Construction of this filing in accordance with the U.S. Supreme Court case ruling in *Haines v. Kerner*, 404 U.S. 519, 30 L. Ed 2d 652, 92 S. Ct 594 (1972).

Furthermore, Petitioner respectfully request this Honorable Court grant unto Petitioner such other and further relief as the May deem Just and Proper.

The foregoing is true and correct I declare under the Penalty of Perjury.

Petitioner respectfully request in the Best Interest of Justice to prevent an ABSOLUTE MISCARriage OF JUSTICE. See *Murray v. Carrier*, 477 U.S. 478, 495, 91 L. Ed 397, 106 S. Ct 2639 (1986)

The foregoing is true and correct I declare under the Penalty of Perjury.



JOSEPH KAISAM

215-45-4345